

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

QUALCOMM INCORPORATED,)
a Delaware corporation; and)
QUALCOMM TECHNOLOGIES, INC.,)
a Delaware corporation,)
)
Plaintiffs,)
)
)
v.)
)
ARM HOLDINGS PLC., f/k/a ARM LTD.,)
a U.K. corporation,)
)
Defendant.)

PLAINTIFFS' MOTION TO STRIKE THE EXPERT REPORTS OF ARM'S EXPERTS
MICHAEL C. BROGIOLI, PH.D. & STEVEN RICHARDS, CPA

Pursuant to the Court's Order referring motions to strike to the Special Master (D.I. 336) and the Order Relating to Procedures for Resolving Disputes Before Special Master (D.I. 350), Plaintiffs Qualcomm Incorporated and Qualcomm Technologies, Inc. ("Qualcomm") hereby move to strike the expert reports of Arm's experts Michael C. Brogioli, Ph.D. and Steven Richards, CPA.

The grounds for this motion are set forth in Qualcomm's letter and accompanying exhibits in support of its motion, which are being separately submitted to the Special Master in accordance with the Court's July 18, 2025 Order (D.I. 336).

OF COUNSEL:

Karen L. Dunn
William A. Isaacson
Melissa F. Zappala
DUNN ISAACSON RHEE LLP
401 Ninth Street NW
Washington, DC 20004
(202) 240-2900

Erin J. Morgan
DUNN, ISAACSON, RHEE LLP
11 Park Place
New York, NY 10007
(202) 240-2900

Catherine Nyarady
Jacob A. Braly
S. Conrad Scott
Jacob Apkon
Flint A. Patterson
PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP
1285 Avenue of the Americas
New York, NY 10019-6064
(212) 373-3000

Adam L. Basner
Eric C. Westerhold
PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP
2001 K Street, NW
Washington, DC 20006-1047
(202) 223-7300

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Jennifer Ying

Jack B. Blumenfeld (#1014)
Jennifer Ying (#5550)
Travis Murray (#6882)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@morrisnichols.com
jying@morrisnichols.com
tmurray@morrisnichols.com

Attorneys for Plaintiffs

September 16, 2025

RULE 7.1.1 CERTIFICATION

Pursuant to D. Del. Local Rule 7.1.1, counsel for plaintiffs met and conferred with counsel for defendant regarding the relief sought by the foregoing motion, and Arm opposes this motion.

/s/ Jennifer Ying

Jennifer Ying (#5550)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

QUALCOMM INCORPORATED,)
a Delaware corporation; and)
QUALCOMM TECHNOLOGIES, INC.,)
a Delaware corporation,)
Plaintiffs,)
v.) C.A. No. 24-490 (MN)
ARM HOLDINGS PLC., f/k/a ARM LTD.,)
a U.K. corporation,)
Defendant.)

[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION TO STRIKE

AND NOW, this ____ day of _____, 2025, the Court having considered Plaintiffs' Motion to Strike, Plaintiffs' letter and supporting papers in support thereof, and any opposition thereto;

IT IS HEREBY ORDERED that the Motion is GRANTED;

IT IS FURTHER HEREBY ORDERED that the Expert Reports of Michael C. Brogioli, Ph.D. and Steven Richards, CPA dated September 5, 2025 are stricken. Defendant may not rely on the Brogioli or Richards reports or opinions expressed therein in this case.

J.

CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on September 16, 2025, upon the following in the manner indicated:

Anne Shea Gaza, Esquire
Robert M. Vrana, Esquire
Samantha G. Wilson, Esquire
YOUNG CONAWAY STARGATT & TAYLOR, LLP
Rodney Square
1000 North King Street
Wilmington, DE 19801
Attorneys for Defendant

VIA ELECTRONIC MAIL

Scott F. Llewellyn, Esquire
MORRISON & FOERSTER LLP
4200 Republic Plaza
370 Seventeenth Street
Denver, CO 80202
Attorneys for Defendant

VIA ELECTRONIC MAIL

Nicholas R. Fung, Esquire
Henry Huttinger, Esquire
MORRISON & FOERSTER LLP
707 Wilshire Blvd., Suite 6000
Los Angeles, CA 90017
Attorneys for Defendant

VIA ELECTRONIC MAIL

Kyle W.K. Mooney, Esquire
Kyle D. Friedland, Esquire
MORRISON & FOERSTER LLP
250 West 55th Street
New York, NY 10019
Attorneys for Defendant

VIA ELECTRONIC MAIL

Erik J. Olson, Esquire
MORRISON & FOERSTER LLP
755 Page Mill Road
Palo Alto, CA 94304
Attorneys for Defendant

VIA ELECTRONIC MAIL

Gregg F. LoCascio, P.C.
Jason M. Wilcox, P.C.
KIRKLAND & ELLIS LLP
1301 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Attorneys for Defendant

VIA ELECTRONIC MAIL

Jay Emerick, Esquire
KIRKLAND & ELLIS LLP
333 West Wolf Point Plaza
Chicago, IL 60654
Attorneys for Defendant

VIA ELECTRONIC MAIL

/s/ Jennifer Ying

Jennifer Ying (#5550)